

**3 RIVERS PCS, INC. d/b/a  
3 RIVERS WIRELESS  
P.O. BOX 3387  
GREAT FALLS, MONTANA 59403-3387**

Marlene Dortch, Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: CC Docket No. 94-102  
Broadband PCS Station WPOI209  
Eighth Quarterly Report**

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel Networks' CDMA equipment for its PCS network.

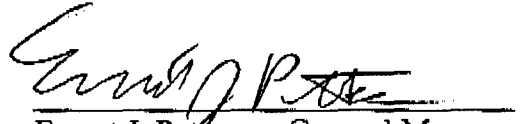
We are continuing to follow the progress of the Wireless TTY Forum and are continuing to work with our switch supplier, Nortel Networks, and our handset vendors toward effecting compliance with the Commission's requirements for providing TTY

access to E-911 calling systems over our PCS facilities. The attachment hereto details the progress we have made as of December 31, 2002.

Respectfully submitted,

**3 RIVERS PCS, INC. d/b/a  
3 RIVERS WIRELESS**

By:

  
Ernest J. Peterson, General Manager

Dated: January 10, 2003

*Of Counsel:*

*Harold Mordkofsky  
Blooston, Mordkofsky, Dickens, Duffy & Prendergast  
2120 L Street, N.W.  
Washington, DC 20037  
Tel. (202) 828-5520  
Fax (202) 828-5568  
Email halmor@bloostonlaw.com*

**3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless**  
**E911 TTY Device Capability Report as of December 31, 2002**

**Network and Infrastructure Development** – In our last quarterly report 3 Rivers PCS Inc. noted that we were still in the process of moving to split our dual load DMS-100 switch to two separate switches. This migration will allow us to implement software load MTX 10.x. With the implementation of this software we will become TTY compliant on our switch.

As of December 12<sup>th</sup>, 2002 3 Rivers PCS received a proposal from Nortel Networks to start the process of splitting our switch to the new configuration. We have worked through the quote and feel confident that the process of installing a new switch will begin at the end of 2<sup>nd</sup> quarter of 2003. Our current time line would show that completion of the install and turn up will be by the end of 3<sup>rd</sup> quarter 2003.

Once this is completed 3 Rivers PCS will be able to migrate to software load MTS 10.x; which will then allow us to be compliant with the TTY federal mandate.

**Handset Development and Testing Plans** – Currently, 3 Rivers PCS has several handsets that are TTY compatible. They are the Kyocera 2325/5135, Motorola V60i, and Nokia 3585/6385. We have carried these handsets for a short period of time and are working to implement a test plan that will allow us to test the phones once the switch split and the new software are installed. In addition we are anticipating other models this year and will also test with each of those.

**Beta and Lab Testing** – Our plan is to test with the Montana School for the Deaf and Blind. As equipment becomes available, 3 Rivers PCS Inc will begin the testing process as soon as all aspects of the network infrastructure are completed.

**Release and General Availability to Carriers of Network Infrastructure Software** – The software is currently available, but 3 Rivers is unable to install the software on its current switching platform. Once the switch conversion is complete from the Dual Load DMS-100 Wireless on Wire Line to a standalone MTX platform, we will then be able to install the required software.

**Availability to Carriers of Full Digital Acceptance Test Units** – We are anticipating new units to be arriving this next year. We currently carry the Kyocera 2325/5135, Motorola V60i, and Nokia 3585/6385. Being a small carrier we are unable to be on the front end of any handset release. Normally we are 6-12 months behind the larger carriers.

**Efforts Toward Achieving Digital Wireless Solution Compatibility w/ Enhanced TTY** – 3 Rivers PCS was the first wireless carrier to implement and complete the 711-dialing pattern across its network in the State of Montana. We are involved with MTAP

(Montana Telecommunications Access Program) to stay abreast of developments that will enhance the ability of the hearing impaired to use digital wireless equipment. And, we are on an expedited schedule to complete our infrastructure reconfiguration to become compliant.

**Carrier Coordination with the PSAP** – 3 Rivers will coordinate with each independent PSAP in its service area once the service is deployed. All coordination with the PSAP will be done on a case-by-case basis.

**Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and Other Necessary Test** – Each of these will be tested once equipment, software, deployment, installation, and turn up are complete.

**Retail Availability of Necessary Consumer Equipment** – Several handset models are available and being carried by 3 Rivers- Kyocera 2325/5135, Motorola V60i, and Nokia 3585/6385. We are anticipating several other models arriving this year.

**Geographic Scope of Network Infrastructure Deployment** – Our switch currently needs to be split from a Dual Load DMS-100 Wireless on Wire Line. Once this is completed we will have a standalone MTX Wireless switch; therefore implementation of the software will be network wide.